

REMARKS

Claims 18-34 are pending and under current examination. Applicants have amended claims 18, 26, and 34. Support for the amendments may be found in the specification at, for example, page 7, line 30 to page 8, line 3, and page 5, lines 25-35.

Office Action

Applicants respectfully traverse the following objection and rejections:

- (1) objection to Figures 1-8;
- (2) rejection of claims 18, 19, 21, 22, 24-27, 29, 30, and 32-34 under 35 U.S.C. § 102(b) as being anticipated by "*FOREIGN-LANGUAGE SPEECH SYNTHESIS*," XP002285739, *Proceedings of ESCA/COCOSD A Workshop on Speech Synthesis*, pp. 177-180, (1998) ("Campbell");
- (3) rejection of claims 23 and 31 under 35 U.S.C. § 103(a) as being unpatentable over Campbell; and
- (4) rejection of claims 20 and 28 under 35 U.S.C. § 103(a) as being unpatentable over Campbell in view of "*Multilingual Text-To-Phoneme Mapping for Speaker Independent Name Dialing in Mobile Terminals*," RTO-MP-066, Sept. 2001 ("Jensen").

Objection to Figures 1-8

The Office Action objected to Figs. 1-8, "because they fail to provide labels for the blocks used in the block and flow diagrams." Office Action, page 2. In response, Applicants amend Figs. 1-8 to include text labels within each block, in compliance with 37 C.F.R. § 1.84(o). Applicants submit herewith eight (8) sheets of drawings, each labeled "Replacement Sheet," containing Figs. 1-8. Accordingly, Applicants deem the objection to the drawings overcome and request its withdrawal.

Applicants request that these replacement sheets of drawings be made of official record in the above-identified patent application. If the drawings for any reason are not in full compliance with the pertinent statutes and regulations, please so advise the undersigned.

Rejection of Claims 18, 19, 21, 22, 24-27, 29, 30, and 32-34 under 35 U.S.C. § 102(b)

Applicants request reconsideration and withdrawal of the rejection of claims 18, 19, 21, 22, 24-27, 29, 30, and 32-34 under 35 U.S.C. § 102(b) as being anticipated by Campbell. In order to establish anticipation under 35 U.S.C. § 102, the Office Action must show that each and every element as set forth in the claim is found, either explicitly or inherently, in Campbell. See M.P.E.P. § 2131. Furthermore, “[t]he elements must be arranged as required by the claim.” *Id.* Campbell, however, does not disclose each and every element of the Applicants’ claims. Moreover, the Office Action has mischaracterized Campbell.

The Office Action alleges that Campbell discloses, either expressly or inherently, each and every element of claims 18, 19, 21, 22, 24-27, 29, 30, and 32-34. See Office Action, pages 3-6. For example, in rejecting claims 18 and 26, the Office Action alleges that Campbell teaches a method and system for text-to-speech conversion “of a text in a first language comprising sections in at least one second language, comprising ... carrying out similarity tests between each phoneme of said phonemes of said second language being mapped and a set of candidate mapping phonemes of said first language.” Office Action, pages 3-4.

Despite this allegation, Campbell does not disclose or suggest at least Applicants’ claimed “carrying out non-acoustic similarity tests between each phoneme of said phonemes of said second language being mapped and a set of candidate mapping phonemes of said first language,” as recited in claims 18 and 26.

Campbell generally discloses “a method of concatenative speech synthesis for producing speech in a language other than that of a database speaker.” See Campbell, Abstract (emphasis added). Specifically, Campbell discloses “a method for a) selecting a sequence of segments that best match the sounds of the target speech through use of a mapping vector and b) using an intermediate synthesis stage.” See Campbell, section 1, paragraph 5 (emphasis added).

Campbell also discloses that “[i]n the second stage of processing (Figure 4) we select speech waveform segments from the non-native speaker’s database by comparing their acoustic similarity to the model speech synthesised using the native speaker’s voice.” See Campbell, section 3.2, paragraph 4 (emphasis added). Therefore, the mapping procedure disclosed in Campbell requires the additional burden of performing an acoustic comparison between segments.

Thus, Campbell does not disclose or suggest “carrying out non-acoustic similarity tests between each phoneme of said phonemes of said second language being mapped and a set of candidate mapping phonemes of said first language,” as recited in claims 18 and 26 (emphasis added).

Since Campbell does not disclose each and every element of independent claims 18 and 26, Campbell does not anticipate these claims under 35 U.S.C. § 102(b). Therefore, claims 18 and 26 should be allowable over Campbell. Dependent claims 19, 21, 22, 24-25, 27, 29, 30, and 32-34 should also be allowable at least due to their dependence from base claim 18 or 26, as well as because they recite additional features not taught or suggested by Campbell. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection.

Remaining Rejections of Claims 23 and 31, and 20 and 28, under 35 U.S.C. § 103(a)

Applicants request reconsideration and withdrawal of the remaining rejections of claims 23 and 31, and 20 and 28, under 35 U.S.C. § 103(a) as being unpatentable over Campbell, or over Campbell in view of Jensen.

The Office Action has not properly resolved the *Graham* factual inquiries, the proper resolution of which is the requirement for establishing a framework for an objective obviousness analysis. See M.P.E.P. § 2141(II), citing to *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ

459 (1966), as reiterated by the U.S. Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. 398, 82 USPQ2d 1385 (2007).

In particular, the Office Action has not properly determined the scope and content of the prior art. Specifically, Campbell and Jensen do not teach or suggest what the Office Action attributes to them. In addition, the Office Action has not properly ascertained the differences between the claimed invention and the prior art, at least because it has not properly interpreted the prior art and considered both the invention and the prior art as a whole. See M.P.E.P. § 2141(II)(B).

As explained above, Applicants have established that Campbell does not disclose or suggest at least Applicants' claimed "carrying out non-acoustic similarity tests between each phoneme of said phonemes of said second language being mapped and a set of candidate mapping phonemes of said first language," as recited in claims 18 and 26 (emphasis added).

Jensen fails to cure the deficiencies of Campbell. Jensen, for example, discloses experiments on "multilingual Text-To-Phoneme (ML-TTP) mapping for speaker independent name dialing." See Jensen, Abstract. Jensen discloses the use of acoustic modules and states that "they have been observed to give good performance when used for other languages based on phonemes." See Jensen, section 4.1, paragraph 2. Jensen further states that "[t]he acoustic phoneme models in this work were based on a low complexity hybrid." See Id. Therefore, like Campbell, Jensen also fails to disclose or suggest at least "carrying out non-acoustic similarity tests between each phoneme of said phonemes of said second language being mapped and a set of candidate mapping phonemes of said first language," as recited in claims 18 and 26.

Therefore, Campbell and Jensen, whether taken alone or in combination, do not teach or suggest at least the above-quoted features of independent claims 18 and 26. Thus, the Office Action has neither properly determined the scope and content of the prior art, nor properly

ascertained the differences between the claimed invention and the prior art. Independent claims 18 and 26 should therefore be allowable over Campbell and Jensen. Therefore, dependent claims 20, 23, 28, and 31 should be allowable at least by virtue of their respective dependence from base claim 18 or 26, and because they recite additional features not taught or suggested in Campbell and Jensen. Accordingly, Applicants respectfully request withdrawal of the remaining rejections under 35 U.S.C. § 103(a).

Conclusion

Applicants request reconsideration of the application and withdrawal of the objection and rejections. Pending claims 18-34 are in condition for allowance, and Applicants request a favorable action.

The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statements are identified herein, Applicants decline to automatically subscribe to any statements or characterizations.

If there are any remaining issues or misunderstandings, Applicants request the Examiner telephone the undersigned representative to discuss them.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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